



RIGHT2KNOW

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Mr. Robert Makatu
Department of Communications
Via email: robert@doc.gov.za
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re: R2K submission: Community Broadcasting Support Scheme

Introduction

The Right2Know Campaign (R2K) is a nation-wide coalition of people and organisations concerned with promoting openness and the free flow of information, particularly the right to access information and freedom of expression. Our campaign is coordinated through voluntary working groups in the Western Cape, Gauteng, KwaZulu-Natal, as well as an elected national working group consisting of representatives from key civil society organisations, community groups and social movements across the country.

R2K vision is to “seek a country and a world where we all have the right to know – that is to be free to access and to share information. This right is fundamental to any democracy that is open, accountable, participatory and responsive; able to deliver the social, economic and environmental justice we need. On this foundation, a society and an international community can be built in which we all live free from want, in equality and in dignity.”

R2K thanks the Department of Communication (DoC) for the opportunity to comment on the revised Community Broadcasting Support Scheme and for the invitation to attend the consultative held on 22 and 23 February 2017. While R2K did not make a submission on the first draft of this proposed framework, we broadly endorsed the submission made by the SOS Coalition.

R2K’s position on media freedom, diversity and community broadcasting.

Most community media have failed to deliver on their democratising potential. Instead they face a daily struggle to survive because they have been left to fend for themselves in a hostile marketplace. They are largely dependent on advertising and must please their advertisers to maintain this trickle of income. Many of these media serve sections of the population that are of very limited value to advertisers.

Government is the largest advertiser, meaning that many community media organisations will find it hard to take positions that are independent or critical of government. They survive

on crumbs and don't have the funds to employ skilled and independent journalists, or hold discussions on the burning issues of the day. Too many community media projects choose to play it safe by focusing on entertainment, doing 'public relations' for government or big businesses, and staying away from issues likely to upset local political and economic elites.

If we want a vibrant democracy we must invest properly in community assets like radio stations that give more power to the people, and that are democratically owned by the communities they serve.

We must invest in non-commercial media. A good place to start would be to ensure every local community radio and TV receives an annual grant a year to cover basic costs.

If we want community media that serve the people, it must be paid for through the tax system.

R2K has proposed that It would cost community stations about R3-million¹ a year to offer a basic quality service. A link to our proposal: "Media Transformation & the Right to Communicate", November 2015 can be found [here](#).

This investment in our democracy would be enough to give greater independence to media projects and let them employ skilled journalists to undertake investigations, hold those in power to account, and address the burning issues of the day. Apart from securing funding for these projects, we must demand that their content does not imitate the commercial media - they should present the voices and issues of the marginalized.

Since its inception, R2K has taken several resolutions at its annual national summits (it's highest decision-making body) including:

- Campaigning to raise awareness in communities on their rights with regard to ownership and access to community media organisations.
- Campaigning for an annual grant to support community media.
- Empower communities to engage their community radio around both governance and content production issues.
- Support communities to produce and disseminate their own media content.

Comments on the proposed Community Broadcasting Support Scheme

R2K welcomes two significant and important shifts from the first draft: that the Doc will be confining its role to policy formulation and will no longer be an implementing agent (e.g. disbursement of funds); and that the powers and scope of the role of the Minister have been addressed.

¹ The figure of R3million represents an increase on average budget of a selection of community radio organisations surveyed in The State and Fate of Community Media: Prospects for Enhancing Media Diversity (2012). Available at: <http://www.r2k.org.za/state-and-fate-of-community-media-2012>

R2K agrees that the Media Development and Diversity Agency (MDDA) should be responsible for the disbursements of both infrastructure and programme production funds (not Nemisa) with Sentech responsible for signal distribution funds. However, MDDA will need to be strengthened and capacitated to meet the increased demand. R2K also notes the recent departure of the MDDA CEO (after two months) and remains concerned about the on-going instability at the Agency.

In respect of the proposal that community broadcasters get 20% of their funding from advertising and 80% from the sale of time slots to companies / organisations that serve the local community, we agree that there should be no strict prescriptions to avoid a 'one-size fits all' syndrome.

We support the workshop suggestions that the policy should rather focus on promoting multi-funding streams for community broadcasters and that any support should be at arms-length, and structured in such a way that it does not interfere with editorial independence by commercial or political interests. It is crucial that a mixed and realistic set of funding models be adopted.

In line with our resolution to campaign for an annual grant for community broadcasters, we support the proposal to that a base figure be allocated to community broadcasters on clearly defined criteria to cater for the payment of core running costs (e.g. transmission costs and the development of local content that is distinct, original and appropriate to local needs, including a bigger focus on news). This should be made available for those stations who comply with both the letter and spirit of community broadcasting and all statutory and regulatory requirements.

We also concur that funding should not be left at municipality level, because of historical and current geographic inequalities. We support the proposal that municipalities support community broadcasters through a ring-fenced communications/advertising budget.

We agree that there should be no requirement/prescriptions requiring the housing of community broadcasters in municipal premises. This suggestion has been mooted by the DoC since 2007 and there have been consistent concerns raised in that period about the potential impact this will have for the independence of community broadcasters. This concern was reiterated at the consultative workshop.

Like many community broadcasters, we are concerned about a duplication arising from a mushrooming of government and municipal-owned media platforms. We support calls to encourage municipalities to avoid duplication of resources and to encourage them to utilise existing community media platforms rather than competing for resources with the media sector.

R2K endorses the proposal that ICASA (the regulator) abandon the application process set out for Class Licenses in favour of a more open and transparent process that ensures licenses are given to the most deserving, compliant and representative applicants.

R2K agrees that SAMRO and Sentech should have fee-regimes that take into account that community broadcasting is not a commercial enterprise to make it viable/affordable for the community sector and there should not be any inflation-related increases that apply to community broadcasters.

R2K supports the calls expressed at the consultative workshop for a blanket amnesty for entities that have defaulted due to lack of funding and that community broadcasters should get an annual and guaranteed base funding towards transmission costs to be reviewed after five years.

The DoC should attend to the undertaking made three years ago that 30% of government adspend must be directed at community media (print, radio and television) as a matter of priority. R2K is extremely concerned that this measure has not yet been adequately implemented.

Concerns

R2K remains concerned that the overall language of the revised document is still skewed towards “investment”, “economic stimulation” etc. and does not fit the existing framework where community broadcasters (particularly television) are required to be not-for-profit.

R2K is also concerned that the model for community television being proposed appears to be weighted very much in favour of the provincial broadcasting model. It is not clear how this will align with the existing legislative and policy framework.

Community broadcasters must cover provincial and local events and not just national events (such as the State of the Nation Address), and must be specifically supported to do so. Specific provision also needs to be made for underserved and marginalised groups – including the working class, unemployed people, LGBTI, and sex workers amongst others - in addition to those already identify in current policy – women, children (and youth) and the disabled. An active audience is vital.

‘Local’ languages and local content needs further refinement. For local languages, it must include more than the official languages of a province and/or local municipality where the station concerned services a geographic community. Definitions need to also consider marginalised languages and groups within the defined community.

R2K argues that in addition to strengthening the cultural fabric of South Africa, local content and programming should be aligned with and promote constitutional values and human rights as well as be original and distinctive.

Quarterly visits by MDDA, DoC and ICASA are likely to be impractical and cumbersome. Annual or six-monthly monitoring is probably more feasible. ICASA and MDDA should set up mechanisms to share reporting from ICASA’s complaints and compliance unit and MDDA’s project assessments.

The DoC needs to provide more detailed financial calculations regarding projections and costs – the document is completely silent on the proposed budget allocations.

Conclusion

Once again, R2K thanks the DoC for this opportunity to ensure public participation in the formulation of this policy framework and we are available for any oral submissions in respect of our submission.

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